



IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 1:14-CR-277
	)	
JAMES EDWARD QUINN,	)	Hon. Liam O'Grady
WORLD MEDICAL LIMITED, and	)	
ATLANTIC PHARMACEUTICALS AG,	)	
	)	
Defendants.	)	

**PROTECTIVE ORDER**

This matter is before the Court on the parties' joint motion for protective order restricting from disclosure and dissemination certain documents and information produced or to be produced by the United States to counsel for Defendants JAMES EDWARD QUINN, WORLD MEDICAL LIMITED, and ATLANTIC PHARMACEUTICALS AG, as part of its discovery obligations in this case, including the following:

All financial and personally identifiable information ("PII") contained in evidence collected in this case, including but not limited to information obtained from search warrants, subpoenas, and evidence provided by the consent of defendants or witnesses.

IT IS ORDERED THAT:

1. Such information shall be referred to as "Protected Information." Protected Information shall be governed by the following restrictions:

- a. The United States shall disclose Protective Information, in accordance with its discovery obligations, to the Defendants' attorney, who will be responsible for maintaining the Protected Information.
- b. Access to Protected Information shall be restricted to persons authorized by the Order, namely, the Defendants' counsel of record, attorneys, paralegals, investigators, experts, and secretaries employed by the attorney of record and performing work on behalf of the Defendants, and under the conditions specified below, the Defendants.
- c. The Defendants shall not possess documents containing Protected Information in unredacted form at any time. The Defendants may review information containing Protected Information under the strict supervision of their counsel.
- d. The Defendants, Defendants' counsel, and the above-designated individuals shall not:
  - i. Make copies of documents containing Protected Information for, or allow copies of any kind to be made by, any other person;
  - ii. Allow any other person to read Protected Information; or
  - iii. Use the Protected Information for any purpose unrelated to the above-captioned proceedings.

2. As used in this Motion, the term “Protected Information” includes:

- a. Bank account numbers;
- b. Credit card numbers;
- c. Social Security Numbers;
- d. Birth dates;
- e. Names of victims or their family members;
- f. Home addresses;
- g. Telephone numbers;
- h. Any other information that, in combination with any other non-personally identifying information, would serve to identify an individual.

3. The Defendants’ counsel is under the following obligations, unless and until further ordered by the Court:

- a. The Defendants’ counsel shall inform any person to whom disclosure may be made pursuant to the Order of the existence and terms of the Order.
- b. Nothing in the Order shall restrict the use or introduction as evidence by the Defendants’ counsel of Protected Information or information during, or in preparation for, any proceeding in this matter. The Defendants’ counsel, however, must redact any PII in accordance with Federal Rule of Criminal Procedure 49.1.
- c. At the request of the government and consistent with the ethical responsibilities of defense counsel, all Protected Information and

reproductions thereof shall be returned to the United States Attorney's  
Office forthwith at the conclusion of the litigation of the case.

IT IS SO ORDERED.

/s/ [Signature]  
Liam O'Grady  
~~United States District Judge~~  
~~The Honorable Liam O'Grady~~  
United States District Judge

Date: Aug 18, 2014  
Alexandria, Virginia

We ask for this:

Dana J. Boente  
United States Attorney

[Signature]  
Kevin H. Marino, Esq. (pro hac vice)  
Marvin D. Miller, Esq.  
Counsel for Defendants James Quinn,  
World Medical Limited, and  
Atlantic Pharmaceuticals AG

By: [Signature]  
Maya D. Song  
Assistant United States Attorney